

# Statement of Basis of the Federal Operating Permit

Leedo Manufacturing Co., L.P.

Site Name: East Bernard Plant  
Area Name: Wood Kitchen Cabinet Manufacturing Plant  
Physical Location: 16856 Cabinet Rd  
Nearest City: East Bernard  
County: Wharton

Permit Number: O1788  
Project Type: Renewal

North American Industry Classification System (NAICS) Code: 337110  
NAICS Name: Wood Kitchen Cabinet and Countertop Manufacturing

This Statement of Basis sets forth the legal and factual basis for the draft permit conditions in accordance with 30 TAC §122.201(a)(4). Per 30 TAC §§ 122.241 and 243, the permit holder has submitted an application under § 122.134 for permit renewal. This document may include the following information:

- A description of the facility/area process description;
- A basis for applying permit shields;
- A list of the federal regulatory applicability determinations;
- A table listing the determination of applicable requirements;
- A list of the New Source Review Requirements;
- The rationale for periodic monitoring methods selected;
- The rationale for compliance assurance methods selected;
- A compliance status; and
- A list of available unit attribute forms.

Prepared on: September 25, 2017

## Operating Permit Basis of Determination

### Permit Area Process Description

Leedo is a kitchen and vanity cabinet manufacturer based in East Bernard, Texas. Plant production is based on assembling and finishing wood cabinets in three coating lines: the Automatic Stain Line, Stain Line 2, and the ultraviolet (UV) sealer and topcoat line. Leedo utilizes waterborne stains on the Automatic Stain Line, and UV curable sealers and topcoats on the UV Line, which are applied with automatic spray equipment and have very low VOC content. Manual spraying application of coatings occurs on Line 2. These three surface coating lines are all located in Building 3 at the Leedo facility.

Gluing application for the production of thermafoil cabinets occurs in Building 1A (part of the main production area) in the Building 1A Glue Booth. Wood glue is applied in Building 2 for production of cabinets, drawers, and cabinet parts. Building 4 is the warehouse area for packaging and shipping finished cabinets. Operations in Building 5 include the cutting, shaping, and gluing application for the production of laminate countertops.

The general process is as follows: the cabinets are initially assembled, hand-sanded, and then sprayed with stain. After the stain has been applied, the cabinets are conveyed to an oven for drying if necessary. The stained cabinet parts are then conveyed to a spray booth for sealer application. Following sealer application, the cabinets are conveyed to an oven for drying, hand-sanded, and then conveyed to a spray booth for topcoat application. The majority of sealer and topcoat operations occur in the UV-cured sealer and topcoat line. Another oven will then dry the finished cabinets before they are packaged and shipped.

Volatile organic compounds (VOC), including hazardous air pollutants (HAPs), exempt solvent (ES), and PM10 emissions are generated during the spray-coating operations at Leedo. The spray booths utilize vacuum ventilation and dry filter pads for collection of particulates. Particulate emissions resulting from paint overspray are controlled with dry filters at 95% efficiency. All PM emissions from the paint booths are considered to be particulates with an aerodynamic diameter of 10 microns or less (PM10). Emissions of NOx, CO, SO2, VOC and PM occur from natural gas combustion in the drying ovens.

### FOPs at Site

The "application area" consists of the emission units and that portion of the site included in the application and this permit. Multiple FOPs may be issued to a site in accordance with 30 TAC § 122.201(e). When there is only one area for the site, then the application information and permit will include all units at the site. Additional FOPs that exist at the site, if any, are listed below.

Additional FOPs: None

### Major Source Pollutants

The table below specifies the pollutants for which the site is a major source:

Major Pollutants	HAPS
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### Reading State of Texas's Federal Operating Permit

The Title V Federal Operating Permit (FOP) lists all state and federal air emission regulations and New Source Review (NSR) authorizations (collectively known as "applicable requirements") that apply at a particular site or permit area (in the event a site has multiple FOPs). **The FOP does not authorize new emissions or new construction activities.** The FOP begins with an introductory page which is common to all Title V permits. This page gives the details of the company, states the authority of the issuing agency, requires the company to operate in accordance with this permit and 30 Texas Administrative Code (TAC) Chapter 122, requires adherence with NSR requirements of 30 TAC Chapter 116, and finally indicates the permit number and the issuance date.

This is followed by the table of contents, which is generally composed of the following elements. Not all permits will have all of the elements.

- General Terms and Conditions
- Special Terms and Conditions
  - Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting
  - Additional Monitoring Requirements
  - New Source Review Authorization Requirements
  - Compliance Requirements
  - Protection of Stratosphere Ozone
  - Permit Location
  - Permit Shield (30 TAC § 122.148)
- Attachments
  - Applicable Requirements Summary
    - Unit Summary
    - Applicable Requirements Summary
  - Additional Monitoring Requirements
  - Permit Shield
  - New Source Review Authorization References
  - Compliance Plan
  - Alternative Requirements
- Appendix A
  - Acronym list

#### General Terms and Conditions

The General Terms and Conditions are the same and appear in all permits. The first paragraph lists the specific citations for 30 TAC Chapter 122 requirements that apply to all Title V permit holders. The second paragraph describes the requirements for record retention. The third paragraph provides details for voiding the permit, if applicable. The fourth paragraph states that the permit holder shall comply with the requirements of 30 TAC Chapter 116 by obtaining a New Source Review authorization prior to new construction or modification of emission units located in the area covered by this permit. The fifth paragraph provides details on submission of reports required by the permit.

#### Special Terms and Conditions

Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting. The TCEQ has designated certain applicable requirements as site-wide requirements. A site-wide requirement is a requirement that applies uniformly to all the units or activities at the site. Units with only site-wide requirements are addressed on Form OP-REQ1 and are not required to be listed separately on a OP-UA Form or Form OP-SUM. Form OP-SUM must list all units addressed in the application and provide identifying information, applicable OP-UA Forms, and preconstruction authorizations. The various OP-UA Forms provide the characteristics of each unit from which applicable requirements are established. Some exceptions exist as a few units may have both site-wide requirements and unit specific requirements.

Other conditions. The other entries under special terms and conditions are in general terms referring to compliance with the more detailed data listed in the attachments.

#### Attachments

Applicable Requirements Summary. The first attachment, the Applicable Requirements Summary, has two tables, addressing unit specific requirements. The first table, the Unit Summary, includes a list of units with applicable requirements, the unit type, the applicable regulation, and the requirement driver. The intent of the requirement driver is to inform the reader that a given unit may have several different operating scenarios and the differences between those operating scenarios.

The applicable requirements summary table provides the detailed citations of the rules that apply to the various units. For each unit and operating scenario, there is an added modifier called the “index number,” detailed citations specifying

monitoring and testing requirements, recordkeeping requirements, and reporting requirements. The data for this table are based on data supplied by the applicant on the OP-SUM and various OP-UA forms.

**Additional Monitoring Requirement.** The next attachment includes additional monitoring the applicant must perform to ensure compliance with the applicable standard. Compliance assurance monitoring (CAM) is often required to provide a reasonable assurance of compliance with applicable emission limitations/standards for large emission units that use control devices to achieve compliance with applicant requirements. When necessary, periodic monitoring (PM) requirements are specified for certain parameters (i.e. feed rates, flow rates, temperature, fuel type and consumption, etc.) to determine if a term and condition or emission unit is operating within specified limits to control emissions. These additional monitoring approaches may be required for two reasons. First, the applicable rules do not adequately specify monitoring requirements (exception- Maximum Achievable Control Technology Standards (MACTs) generally have sufficient monitoring), and second, monitoring may be required to fill gaps in the monitoring requirements of certain applicable requirements. In situations where the NSR permit is the applicable requirement requiring extra monitoring for a specific emission unit, the preferred solution is to have the monitoring requirements in the NSR permit updated so that all NSR requirements are consolidated in the NSR permit.

**Permit Shield.** A permit may or may not have a permit shield, depending on whether an applicant has applied for, and justified the granting of, a permit shield. A permit shield is a special condition included in the permit document stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirement(s) or specified applicable state-only requirement(s).

**New Source Review Authorization References.** All activities which are related to emissions in the state of Texas must have a NSR authorization prior to beginning construction. This section lists all units in the permit and the NSR authorization that allowed the unit to be constructed or modified. Units that do not have unit specific applicable requirements other than the NSR authorization do not need to be listed in this attachment. While NSR permits are not physically a part of the Title V permit, they are legally incorporated into the Title V permit by reference. Those NSR permits whose emissions exceed certain PSD/NA thresholds must also undergo a Federal review of federally regulated pollutants in addition to review for state regulated pollutants.

**Compliance Plan.** A permit may have a compliance schedule attachment for listing corrective actions plans for any emission unit that is out of compliance with an applicable requirement.

**Alternative Requirements.** This attachment will list any alternative monitoring plans or alternative means of compliance for applicable requirements that have been approved by the EPA Administrator and/or the TCEQ Executive Director.

Appendix A

Acronym list. This attachment lists the common acronyms used when discussing the FOPs.

**Stationary vents subject to 30 TAC Chapter 111, Subchapter A, § 111.111(a)(1)(B) addressed in the Special Terms and Conditions**

The site contains stationary vents with a flowrate less than 100,000 actual cubic feet per minute (acfm) and constructed either before or after January 31, 1972 which are limited, over a six-minute average, to 20% opacity as required by 30 TAC § 111.111(a)(1)(B). As a site may have a large number of stationary vents that fall into this category, they are not required to be listed individually in the permit's Applicable Requirement Summary. This is consistent with EPA's White Paper for Streamlined Development of Part 70 Permit Applications, July 10, 1995, that states that requirements that apply identically to emission units at a site can be treated on a generic basis such as source-wide opacity limits.

Periodic monitoring is specified in Special Term and Condition 3.A. for stationary vents subject to 30 TAC § 111.111(a)(1)(B) to verify compliance with the 20% opacity limit. These vents are not expected to produce visible emissions during normal operation. The TCEQ evaluated the probability of these sources violating the opacity standards and determined that there is a very low potential that an opacity standard would be exceeded. It was determined that continuous monitoring for these sources is not warranted as there would be very limited environmental benefit in continuously monitoring sources that have a low potential to produce visible emissions. Therefore, the TCEQ set the visible observation monitoring frequency for these sources to once per calendar quarter.

The TCEQ has exempted vents that are not capable of producing visible emissions from periodic monitoring requirements. These vents include sources of colorless VOCs, non-fuming liquids, and other materials that cannot produce emissions that obstruct the transmission of light. Passive ventilation vents, such as plumbing vents, are also included in this category. Since this category of vents are not capable of producing opacity due to the physical or chemical characteristics of the emission source, periodic monitoring is not required as it would not yield any additional data to assure compliance with the 20% opacity standard of 30 TAC § 111.111(a)(1)(B).

In the event that visible emissions are detected, either through the quarterly observation or other credible evidence, such as observations from company personnel, the permit holder shall either report a deviation or perform a Test Method 9 observation to determine the opacity consistent with the 6-minute averaging time specified in 30 TAC § 111.111(a)(1)(B). An additional provision is included to monitor combustion sources more frequently than quarterly if alternate fuels are burned for periods greater than 24 consecutive hours. This will address possible emissions that may arise when switching fuel types.

### **Federal Regulatory Applicability Determinations**

The following chart summarizes the applicability of the principal air pollution regulatory programs to the permit area:

<b>Regulatory Program</b>	<b>Applicability (Yes/No)</b>
Prevention of Significant Deterioration (PSD)	No
Nonattainment New Source Review (NNSR)	No
Minor NSR	Yes
40 CFR Part 60 - New Source Performance Standards	No
40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants (NESHAPs)	No
40 CFR Part 63 - NESHAPs for Source Categories	Yes
Title IV (Acid Rain) of the Clean Air Act (CAA)	No
Title V (Federal Operating Permits) of the CAA	Yes
Title VI (Stratospheric Ozone Protection) of the CAA	No
CSAPR (Cross-State Air Pollution Rule)	No

### **Insignificant Activities**

In general, units not meeting the criteria for inclusion on either Form OP-SUM or Form OP-REQ1 are not required to be addressed in the operating permit application. Examples of these types of units include, but are not limited to, the following:

1. Office activities such as photocopying, blueprint copying, and photographic processes.
2. Sanitary sewage collection and treatment facilities other than those used to incinerate wastewater treatment plant sludge. Stacks or vents for sanitary sewer plumbing traps are also included.
3. Food preparation facilities including, but not limited to, restaurants and cafeterias used for preparing food or beverages primarily for consumption on the premises.
4. Outdoor barbecue pits, campfires, and fireplaces.

5. Laundry dryers, extractors, and tumblers processing bedding, clothing, or other fabric items generated primarily at the premises. This does not include emissions from dry cleaning systems using perchloroethylene or petroleum solvents.
6. Facilities storing only dry, sweet natural gas, including natural gas pressure regulator vents.
7. Any air separation or other industrial gas production, storage, or packaging facility. Industrial gases, for purposes of this list, include only oxygen, nitrogen, helium, neon, argon, krypton, and xenon.
8. Storage and handling of sealed portable containers, cylinders, or sealed drums.
9. Vehicle exhaust from maintenance or repair shops.
10. Storage and use of non-VOC products or equipment for maintaining motor vehicles operated at the site (including but not limited to, antifreeze and fuel additives).
11. Air contaminant detectors and recorders, combustion controllers and shut-off devices, product analyzers, laboratory analyzers, continuous emissions monitors, other analyzers and monitors, and emissions associated with sampling activities. Exception to this category includes sampling activities that are deemed fugitive emissions and under a regulatory leak detection and repair program.
12. Bench scale laboratory equipment and laboratory equipment used exclusively for chemical and physical analysis, including but not limited to, assorted vacuum producing devices and laboratory fume hoods.
13. Steam vents, steam leaks, and steam safety relief valves, provided the steam (or boiler feedwater) has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
14. Storage of water that has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
15. Well cellars.
16. Fire or emergency response equipment and training, including but not limited to, use of fire control equipment including equipment testing and training, and open burning of materials or fuels associated with firefighting training.
17. Crucible or pot furnaces with a brim full capacity of less than 450 cubic inches of any molten metal.
18. Equipment used exclusively for the melting or application of wax.
19. All closed tumblers used for the cleaning or deburring of metal products without abrasive blasting, and all open tumblers with a batch capacity of 1,000 lbs. or less.
20. Shell core and shell mold manufacturing machines.
21. Sand or investment molds with a capacity of 100 lbs. or less used for the casting of metals;
22. Equipment used for inspection of metal products.
23. Equipment used exclusively for rolling, forging, pressing, drawing, spinning, or extruding either hot or cold metals by some mechanical means.
24. Instrument systems utilizing air, natural gas, nitrogen, oxygen, carbon dioxide, helium, neon, argon, krypton, and xenon.
25. Battery recharging areas.
26. Brazing, soldering, or welding equipment.

### **Determination of Applicable Requirements**

The tables below include the applicability determinations for the emission units, the index number(s) where applicable, and all relevant unit attribute information used to form the basis of the applicability determination. The unit attribute information is a description of the physical properties of an emission unit which is used to determine the requirements to which the permit holder must comply. For more information about the descriptions of the unit attributes specific Unit Attribute Forms may be viewed at [www.tceq.texas.gov/permitting/air/nav/air\\_all\\_ua\\_forms.html](http://www.tceq.texas.gov/permitting/air/nav/air_all_ua_forms.html).

A list of unit attribute forms is included at the end of this document. Some examples of unit attributes include construction date; product stored in a tank; boiler fuel type; etc.. Generally, multiple attributes are needed to determine the requirements for a given emission unit and index number. The table below lists these attributes in the column entitled "Basis of Determination." Attributes that demonstrate that an applicable requirement applies will be the factual basis for the specific citations in an applicable requirement that apply to a unit for that index number. The TCEQ Air Permits Division has developed flowcharts for determining applicability of state and federal regulations based on the unit attribute information in a Decision Support System (DSS). These flowcharts can be accessed via the internet at [www.tceq.texas.gov/permitting/air/nav/air\\_supportsys.html](http://www.tceq.texas.gov/permitting/air/nav/air_supportsys.html). The Air Permits Division staff may also be contacted for assistance at (512) 239-1250.

The attributes for each unit and corresponding index number provide the basis for determining the specific legal citations in an applicable requirement that apply, including emission limitations or standards, monitoring, recordkeeping, and

reporting. The rules were found to apply or not apply by using the unit attributes as answers to decision questions found in the flowcharts of the DSS. Some additional attributes indicate which legal citations of a rule apply. The legal citations that apply to each emission unit may be found in the Applicable Requirements Summary table of the draft permit. There may be some entries or rows of units and rules not found in the permit, or if the permit contains a permit shield, repeated in the permit shield area. These are sets of attributes that describe negative applicability, or; in other words, the reason why a potentially applicable requirement does not apply.

If applicability determinations have been made which differ from the available flowcharts, an explanation of the decisions involved in the applicability determination is specified in the column "Changes and Exceptions to RRT." If there were no exceptions to the DSS, then this column has been removed.

The draft permit includes all emission limitations or standards, monitoring, recordkeeping and reporting required by each applicable requirement. If an applicable requirement does not require monitoring, recordkeeping, or reporting, the word "None" will appear in the Applicable Requirements Summary table. If additional periodic monitoring is required for an applicable requirement, it will be explained in detail in the portion of this document entitled "Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected."

When attributes demonstrate that a unit is not subject to an applicable requirement, the applicant may request a permit shield for those items. The portion of this document entitled "Basis for Applying Permit Shields" specifies which units, if any, have a permit shield.

#### Operational Flexibility

When an emission unit has multiple operating scenarios, it will have a different index number associated with each operating condition. This means that units are permitted to operate under multiple operating conditions. The applicable requirements for each operating condition are determined by a unique set of unit attributes. For example, a tank may store two different products at different points in time. The tank may, therefore, need to comply with two distinct sets of requirements, depending on the product that is stored. Both sets of requirements are included in the permit, so that the permit holder may store either product in the tank.

### Determination of Applicable Requirements

Unit ID	Regulation	Index Number	Basis of Determination*
B-4	40 CFR Part 63, Subpart JJ	63JJ-15A	<p>Major Source = The facility is a wood furniture or wood furniture component manufacturing facility that is located at a plant that is a major source as defined in 40 CFR § 63.2.</p> <p>Source Classification = New affected source constructed after December 6, 1994.</p> <p>Formaldehyde Content = The facility does not use low formaldehyde coatings and contact adhesives in the wood furniture manufacturing operations.</p> <p>Research/Laboratory Facility = The source is a production facility.</p> <p>Additional Applicability = None of the above.</p> <p>Contact Adhesive Technique = The facility uses compliant contact adhesives to comply with 40 CFR § 63.802(a)(2)(ii) (for existing affected sources) or 40 CFR § 63.802(b)(2) (for new affected sources).</p> <p>Formaldehyde Control = The facility uses a control system to limit formaldehyde emissions.</p> <p>Facility Operations = Gluing operations using contact adhesives.</p> <p>Quantity of Materials Used = Facility uses greater than 3,000 gallons per rolling 12-month period of coating, gluing, cleaning, and wash off materials from all source categories at the site.</p> <p>HAP Tonnage = The facility uses materials containing more than five tons of any one HAP, or more than 12.5 tons of any combination of HAPs per rolling 12-month period.</p>
B-4	40 CFR Part 63, Subpart JJ	63JJ-15B	<p>Major Source = The facility is a wood furniture or wood furniture component manufacturing facility that is located at a plant that is a major source as defined in 40 CFR § 63.2.</p> <p>Source Classification = New affected source constructed after December 6, 1994.</p> <p>Formaldehyde Content = The facility does not use low formaldehyde coatings and contact adhesives in the wood furniture manufacturing operations.</p> <p>Research/Laboratory Facility = The source is a production facility.</p> <p>Additional Applicability = None of the above.</p> <p>Formaldehyde Control = The facility uses a control system to limit formaldehyde emissions.</p> <p>Facility Operations = Finishing operations.</p> <p>Quantity of Materials Used = Facility uses greater than 3,000 gallons per rolling 12-month period of coating, gluing, cleaning, and wash off materials from all source categories at the site.</p> <p>Combination Compliance Technique = The facility complies with 40 CFR § 63.802(a)(1) (for existing affected sources) or § 63.802(b)(1) (for new affected sources) by using a single compliance option.</p> <p>Compliance by Calculating Average VHAP = The facility does not use calculation the average volatile HAP content for all finishing materials for compliance.</p> <p>HAP Tonnage = The facility uses materials containing more than five tons of any one HAP, or more than 12.5 tons of any combination of HAPs per rolling 12-month period.</p> <p>Compliant Finishing Materials = The facility complies with 40 CFR § 63.802(a)(1) (for existing affected sources) or 63.802(b)(1) (for new affected sources) by using compliant finishing materials.</p> <p>Continuous Coaters = The facility applies coatings using continuous coaters.</p>
B-5	40 CFR Part 63, Subpart JJ	63JJ-16	<p>Major Source = The facility is a wood furniture or wood furniture component manufacturing facility that is located at a plant that is a major source as defined in 40 CFR § 63.2.</p>



Unit ID	Regulation	Index Number	Basis of Determination*
			<p>Source Classification = New affected source constructed after December 6, 1994.</p> <p>Formaldehyde Content = The facility does not use low formaldehyde coatings and contact adhesives in the wood furniture manufacturing operations.</p> <p>Research/Laboratory Facility = The source is a production facility.</p> <p>Additional Applicability = None of the above.</p> <p>Contact Adhesive Technique = The facility uses compliant contact adhesives to comply with 40 CFR § 63.802(a)(2)(ii) (for existing affected sources) or 40 CFR § 63.802(b)(2) (for new affected sources).</p> <p>Formaldehyde Control = The facility uses a control system to limit formaldehyde emissions.</p> <p>Facility Operations = Gluing operations using contact adhesives.</p> <p>Quantity of Materials Used = Facility uses greater than 3,000 gallons per rolling 12-month period of coating, gluing, cleaning, and wash off materials from all source categories at the site.</p> <p>HAP Tonnage = The facility uses materials containing more than five tons of any one HAP, or more than 12.5 tons of any combination of HAPs per rolling 12-month period.</p>
DC-1	40 CFR Part 63, Subpart JJ	63JJ-8A	<p>Major Source = The facility is a wood furniture or wood furniture component manufacturing facility that is located at a plant that is a major source as defined in 40 CFR § 63.2.</p> <p>Source Classification = New affected source constructed after December 6, 1994.</p> <p>Formaldehyde Content = The facility does not use low formaldehyde coatings and contact adhesives in the wood furniture manufacturing operations.</p> <p>Research/Laboratory Facility = The source is a production facility.</p> <p>Additional Applicability = None of the above.</p> <p>Formaldehyde Control = The facility uses a control system to limit formaldehyde emissions.</p> <p>Facility Operations = Finishing operations.</p> <p>Quantity of Materials Used = Facility uses greater than 3,000 gallons per rolling 12-month period of coating, gluing, cleaning, and wash off materials from all source categories at the site.</p> <p>Combination Compliance Technique = The facility complies with 40 CFR § 63.802(a)(1) (for existing affected sources) or § 63.802(b)(1) (for new affected sources) by using a single compliance option.</p> <p>Compliance by Calculating Average VHAP = The facility does not use calculation the average volatile HAP content for all finishing materials for compliance.</p> <p>HAP Tonnage = The facility uses materials containing more than five tons of any one HAP, or more than 12.5 tons of any combination of HAPs per rolling 12-month period.</p> <p>Compliant Finishing Materials = The facility complies with 40 CFR § 63.802(a)(1) (for existing affected sources) or 63.802(b)(1) (for new affected sources) by using compliant finishing materials.</p> <p>Continuous Coaters = The facility applies coatings using continuous coaters.</p>
DC-1	40 CFR Part 63, Subpart JJ	63JJ-8B	<p>Major Source = The facility is a wood furniture or wood furniture component manufacturing facility that is located at a plant that is a major source as defined in 40 CFR § 63.2.</p> <p>Source Classification = New affected source constructed after December 6, 1994.</p> <p>Formaldehyde Content = The facility does not use low formaldehyde coatings and contact adhesives in the wood furniture manufacturing operations.</p> <p>Research/Laboratory Facility = The source is a production facility.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>Additional Applicability = None of the above.</p> <p>Contact Adhesive Technique = The facility uses compliant contact adhesives to comply with 40 CFR § 63.802(a)(2)(ii) (for existing affected sources) or 40 CFR § 63.802(b)(2) (for new affected sources).</p> <p>Formaldehyde Control = The facility uses a control system to limit formaldehyde emissions.</p> <p>Facility Operations = Gluing operations using contact adhesives.</p> <p>Quantity of Materials Used = Facility uses greater than 3,000 gallons per rolling 12-month period of coating, gluing, cleaning, and wash off materials from all source categories at the site.</p> <p>HAP Tonnage = The facility uses materials containing more than five tons of any one HAP, or more than 12.5 tons of any combination of HAPs per rolling 12-month period.</p>
DC-2	40 CFR Part 63, Subpart JJ	63JJ-8B	<p>Major Source = The facility is a wood furniture or wood furniture component manufacturing facility that is located at a plant that is a major source as defined in 40 CFR § 63.2.</p> <p>Source Classification = New affected source constructed after December 6, 1994.</p> <p>Research/Laboratory Facility = The source is a production facility.</p> <p>Contact Adhesive Technique = The facility uses compliant contact adhesives to comply with 40 CFR § 63.802(a)(2)(ii) (for existing affected sources) or 40 CFR § 63.802(b)(2) (for new affected sources).</p> <p>Facility Operations = Gluing operations using contact adhesives.</p> <p>Quantity of Materials Used = Facility uses greater than 3,000 gallons per rolling 12-month period of coating, gluing, cleaning, and wash off materials from all source categories at the site.</p> <p>HAP Tonnage = The facility uses materials containing more than five tons of any one HAP, or more than 12.5 tons of any combination of HAPs per rolling 12-month period.</p> <p>Plant-Wide Emissions = 90 percent or more of plant-wide emissions are from the manufacture or wood furniture or wood furniture components.</p>
GLUE 1	40 CFR Part 63, Subpart JJ	63JJ-14	<p>Major Source = The facility is a wood furniture or wood furniture component manufacturing facility that is located at a plant that is a major source as defined in 40 CFR § 63.2.</p> <p>Source Classification = New affected source constructed after December 6, 1994.</p> <p>Formaldehyde Content = The facility does not use low formaldehyde coatings and contact adhesives in the wood furniture manufacturing operations.</p> <p>Research/Laboratory Facility = The source is a production facility.</p> <p>Additional Applicability = None of the above.</p> <p>Contact Adhesive Technique = The facility uses compliant contact adhesives to comply with 40 CFR § 63.802(a)(2)(ii) (for existing affected sources) or 40 CFR § 63.802(b)(2) (for new affected sources).</p> <p>Formaldehyde Control = The facility uses a control system to limit formaldehyde emissions.</p> <p>Facility Operations = Gluing operations using contact adhesives.</p> <p>Quantity of Materials Used = Facility uses greater than 3,000 gallons per rolling 12-month period of coating, gluing, cleaning, and wash off materials from all source categories at the site.</p> <p>Combination Compliance Technique = The facility complies with 40 CFR § 63.802(a)(1) (for existing affected sources) or § 63.802(b)(1) (for new affected sources) by using a single compliance option.</p> <p>Compliance by Calculating Average VHAP = The facility does not use calculation the average volatile HAP content for all finishing materials for compliance.</p> <p>HAP Tonnage = The facility uses materials containing more than five tons of any one HAP, or more than 12.5 tons of any combination of HAPs per rolling 12-month period.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>Compliant Finishing Materials = The facility complies with 40 CFR § 63.802(a)(1) (for existing affected sources) or 63.802(b)(1) (for new affected sources) by using compliant finishing materials.</p> <p>Continuous Coaters = The facility applies coatings using continuous coaters.</p>
PROFIN2	40 CFR Part 63, Subpart JJ	63JJ-1	<p>Major Source = The facility is a wood furniture or wood furniture component manufacturing facility that is located at a plant that is a major source as defined in 40 CFR § 63.2.</p> <p>Source Classification = Existing affected source constructed on or before December 6, 1994.</p> <p>Formaldehyde Content = The facility does not use low formaldehyde coatings and contact adhesives in the wood furniture manufacturing operations.</p> <p>Research/Laboratory Facility = The source is a production facility.</p> <p>Additional Applicability = None of the above.</p> <p>Formaldehyde Control = The facility uses a control system to limit formaldehyde emissions.</p> <p>Facility Operations = Finishing operations.</p> <p>Quantity of Materials Used = Facility uses greater than 3,000 gallons per rolling 12-month period of coating, gluing, cleaning, and wash off materials from all source categories at the site.</p> <p>Combination Compliance Technique = The facility complies with 40 CFR § 63.802(a)(1) (for existing affected sources) or § 63.802(b)(1) (for new affected sources) by using a single compliance option.</p> <p>Compliance by Calculating Average VHAP = The facility does not use calculation the average volatile HAP content for all finishing materials for compliance.</p> <p>HAP Tonnage = The facility uses materials containing more than five tons of any one HAP, or more than 12.5 tons of any combination of HAPs per rolling 12-month period.</p> <p>Compliant Finishing Materials = The facility complies with 40 CFR § 63.802(a)(1) (for existing affected sources) or 63.802(b)(1) (for new affected sources) by using compliant finishing materials.</p> <p>Continuous Coaters = The facility applies coatings using continuous coaters.</p>
PROFIN2	40 CFR Part 63, Subpart JJ	63JJ-2	<p>Major Source = The facility is a wood furniture or wood furniture component manufacturing facility that is located at a plant that is a major source as defined in 40 CFR § 63.2.</p> <p>Source Classification = Existing affected source constructed on or before December 6, 1994.</p> <p>Formaldehyde Content = The facility does not use low formaldehyde coatings and contact adhesives in the wood furniture manufacturing operations.</p> <p>Research/Laboratory Facility = The source is a production facility.</p> <p>Additional Applicability = None of the above.</p> <p>Formaldehyde Control = The facility uses a control system to limit formaldehyde emissions.</p> <p>Facility Operations = Facility using strippable spray booth coatings.</p> <p>Quantity of Materials Used = Facility uses greater than 3,000 gallons per rolling 12-month period of coating, gluing, cleaning, and wash off materials from all source categories at the site.</p> <p>HAP Tonnage = The facility uses materials containing more than five tons of any one HAP, or more than 12.5 tons of any combination of HAPs per rolling 12-month period.</p>
ST BOOTH-1	40 CFR Part 63, Subpart JJ	63JJ-3	<p>Major Source = The facility is a wood furniture or wood furniture component manufacturing facility that is located at a plant that is a major source as defined in 40 CFR § 63.2.</p> <p>Source Classification = New affected source constructed after December 6, 1994.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
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ST DRYER-1	40 CFR Part 63, Subpart JJ	63JJ-4	<p>Major Source = The facility is a wood furniture or wood furniture component manufacturing facility that is located at a plant that is a major source as defined in 40 CFR § 63.2.</p> <p>Source Classification = New affected source constructed after December 6, 1994.</p> <p>Formaldehyde Content = The facility does not use low formaldehyde coatings and contact adhesives in the wood furniture manufacturing operations.</p> <p>Research/Laboratory Facility = The source is a production facility.</p> <p>Additional Applicability = None of the above.</p> <p>Formaldehyde Control = The facility uses a control system to limit formaldehyde emissions.</p> <p>Facility Operations = Finishing operations.</p> <p>Quantity of Materials Used = Facility uses greater than 3,000 gallons per rolling 12-month period of coating, gluing, cleaning, and wash off materials from all source categories at the site.</p> <p>Combination Compliance Technique = The facility complies with 40 CFR § 63.802(a)(1) (for existing affected sources) or § 63.802(b)(1) (for new affected sources) by using a single compliance option.</p> <p>Compliance by Calculating Average VHAP = The facility does not use calculation the average volatile HAP content for all finishing materials for compliance.</p> <p>HAP Tonnage = The facility uses materials containing more than five tons of any one HAP, or more than 12.5 tons of any combination of HAPs per rolling 12-month period.</p> <p>Compliant Finishing Materials = The facility complies with 40 CFR § 63.802(a)(1) (for existing affected sources) or 63.802(b)(1) (for new affected sources) by using compliant finishing materials.</p> <p>Continuous Coaters = The facility applies coatings using continuous coaters.</p>
ST DRYER-2	40 CFR Part 63, Subpart JJ	63JJ-5	<p>Major Source = The facility is a wood furniture or wood furniture component manufacturing facility that is located at a plant that is a major source as defined in 40 CFR § 63.2.</p> <p>Source Classification = New affected source constructed after December 6, 1994.</p>

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UV SLR	40 CFR Part 63, Subpart JJ	63JJ-12	<p>Major Source = The facility is a wood furniture or wood furniture component manufacturing facility that is located at a plant that is a major source as defined in 40 CFR § 63.2.</p> <p>Source Classification = New affected source constructed after December 6, 1994.</p> <p>Formaldehyde Content = The facility does not use low formaldehyde coatings and contact adhesives in the wood furniture manufacturing operations.</p> <p>Research/Laboratory Facility = The source is a production facility.</p> <p>Additional Applicability = None of the above.</p> <p>Formaldehyde Control = The facility uses a control system to limit formaldehyde emissions.</p> <p>Facility Operations = Finishing operations.</p> <p>Quantity of Materials Used = Facility uses greater than 3,000 gallons per rolling 12-month period of coating, gluing, cleaning, and wash off materials from all source categories at the site.</p> <p>Combination Compliance Technique = The facility complies with 40 CFR § 63.802(a)(1) (for existing affected sources) or § 63.802(b)(1) (for new affected sources) by using a single compliance option.</p> <p>Compliance by Calculating Average VHAP = The facility does not use calculation the average volatile HAP content for all finishing materials for compliance.</p> <p>HAP Tonnage = The facility uses materials containing more than five tons of any one HAP, or more than 12.5 tons of any combination of HAPs per rolling 12-month period.</p> <p>Compliant Finishing Materials = The facility complies with 40 CFR § 63.802(a)(1) (for existing affected sources) or 63.802(b)(1) (for new affected sources) by using compliant finishing materials.</p> <p>Continuous Coaters = The facility applies coatings using continuous coaters.</p>
UV TCT	40 CFR Part 63, Subpart JJ	63JJ-13	<p>Major Source = The facility is a wood furniture or wood furniture component manufacturing facility that is located at a plant that is a major source as defined in 40 CFR § 63.2.</p> <p>Source Classification = New affected source constructed after December 6, 1994.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>Formaldehyde Content = The facility does not use low formaldehyde coatings and contact adhesives in the wood furniture manufacturing operations.</p> <p>Research/Laboratory Facility = The source is a production facility.</p> <p>Additional Applicability = None of the above.</p> <p>Formaldehyde Control = The facility uses a control system to limit formaldehyde emissions.</p> <p>Facility Operations = Finishing operations.</p> <p>Quantity of Materials Used = Facility uses greater than 3,000 gallons per rolling 12-month period of coating, gluing, cleaning, and wash off materials from all source categories at the site.</p> <p>Combination Compliance Technique = The facility complies with 40 CFR § 63.802(a)(1) (for existing affected sources) or § 63.802(b)(1) (for new affected sources) by using a single compliance option.</p> <p>Compliance by Calculating Average VHAP = The facility does not use calculation the average volatile HAP content for all finishing materials for compliance.</p> <p>HAP Tonnage = The facility uses materials containing more than five tons of any one HAP, or more than 12.5 tons of any combination of HAPs per rolling 12-month period.</p> <p>Compliant Finishing Materials = The facility complies with 40 CFR § 63.802(a)(1) (for existing affected sources) or 63.802(b)(1) (for new affected sources) by using compliant finishing materials.</p> <p>Continuous Coaters = The facility applies coatings using continuous coaters.</p>

\* - The "unit attributes" or operating conditions that determine what requirements apply

## NSR Versus Title V FOP

The state of Texas has two Air permitting programs, New Source Review (NSR) and Title V Federal Operating Permits. The two programs are substantially different both in intent and permit content.

NSR is a preconstruction permitting program authorized by the Texas Clean Air Act and Title I of the Federal Clean Air Act (FCAA). The processing of these permits is governed by 30 Texas Administrative Code (TAC) Chapter 116.111. The Title V Federal Operating Program is a federal program authorized under Title V of the FCAA that has been delegated to the state of Texas to administer and is governed by 30 TAC Chapter 122. The major differences between the two permitting programs are listed in the table below:

NSR Permit	Federal Operating Permit(FOP)
Issued Prior to new Construction or modification of an existing facility	For initial permit with application shield, can be issued after operation commences; significant revisions require approval prior to operation.
Authorizes air emissions	Codifies existing applicable requirements, does not authorize new emissions
Ensures issued permits are protective of the environment and human health by conducting a health effects review and that requirement for best available control technology (BACT) is implemented.	Applicable requirements listed in permit are used by the inspectors to ensure proper operation of the site as authorized. Ensures that adequate monitoring is in place to allow compliance determination with the FOP.
Up to two Public notices may be required. Opportunity for public comment and contested case hearings for some authorizations.	One public notice required. Opportunity for public comments. No contested case hearings.
Applies to all point source emissions in the state.	Applies to all major sources and some non-major sources identified by the EPA.
Applies to facilities: a portion of site or individual emission sources	One or multiple FOPs cover the entire site (consists of multiple facilities)
Permits include terms and conditions under which the applicant must construct and operate its various equipment and processes on a facility basis.	Permits include terms and conditions that specify the general operational requirements of the site; and also include codification of all applicable requirements for emission units at the site.
Opportunity for EPA review for Federal Prevention of Significant Deterioration (PSD) and Nonattainment (NA) permits for major sources.	Opportunity for EPA review, Affected states review, and a Public petition period for every FOP.
Permits have a table listing maximum emission limits for pollutants	Permit has an applicable requirements table and Periodic Monitoring (PM) / Compliance Assurance Monitoring (CAM) tables which document applicable monitoring requirements.
Permits can be altered or amended upon application by company. Permits must be issued before construction or modification of facilities can begin.	Permits can be revised through several revision processes, which provide for different levels of public notice and opportunity to comment. Changes that would be significant revisions require that a revised permit be issued before those changes can be operated.
NSR permits are issued independent of FOP requirements.	FOP are independent of NSR permits, but contain a list of all NSR permits incorporated by reference

## New Source Review Requirements

Below is a list of the New Source Review (NSR) permits for the permitted area. These NSR permits are incorporated by reference into the operating permit and are enforceable under it. These permits can be found in the main TCEQ file room, located on the first floor of Building E, 12100 Park 35 Circle, Austin, Texas. The Public Education Program may be

contacted at 1-800-687-4040 or the Air Permits Division (APD) may be contacted at 1-512-239-1250 for help with any question.

Additionally, the site contains emission units that are permitted by rule under the requirements of 30 TAC Chapter 106, Permits by Rule. The following table specifies the permits by rule that apply to the site. All current permits by rule are contained in Chapter 106. Outdated 30 TAC Chapter 106 permits by rule may be viewed at the following Web site:

[www.tceq.texas.gov/permitting/air/permitbyrule/historical\\_rules/old106list/index106.html](http://www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/old106list/index106.html)

Outdated Standard Exemption lists may be viewed at the following Web site:

[www.tceq.texas.gov/permitting/air/permitbyrule/historical\\_rules/oldselist/se\\_index.html](http://www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/oldselist/se_index.html)

The status of air permits and applications and a link to the Air Permits Remote Document Server is located at the following Web site:

[www.tceq.texas.gov/permitting/air/nav/air\\_status\\_permits.html](http://www.tceq.texas.gov/permitting/air/nav/air_status_permits.html)

#### **New Source Review Authorization References**

<b>Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits By Rule, PSD Permits, or NA Permits) for the Application Area.</b>	
Authorization No.: 77410	Issuance Date: 04/11/2016
<b>Permits By Rule (30 TAC Chapter 106) for the Application Area</b>	
Number: 106.265	Version No./Date: 03/14/1997

#### **Emission Units and Emission Points**

In air permitting terminology, any source capable of generating emissions (for example, an engine or a sandblasting area) is called an Emission Unit. For purposes of Title V, emission units are specifically listed in the operating permit when they have applicable requirements other than New Source Review (NSR), or when they are listed in the permit shield table.

The actual physical location where the emissions enter the atmosphere (for example, an engine stack or a sand-blasting yard) is called an emission point. For New Source Review preconstruction permitting purposes, every emission unit has an associated emission point. Emission limits are listed in an NSR permit, associated with an emission point. This list of emission points and emission limits per pollutant is commonly referred to as the "Maximum Allowable Emission Rate Table", or "MAERT" for short. Specifically, the MAERT lists the Emission Point Number (EPN) that identifies the emission point, followed immediately by the Source Name, identifying the emission unit that is the source of those emissions on this table.

Thus, by reference, an emission unit in a Title V operating permit is linked by reference number to an NSR authorization, and its related emission point.

#### **Monitoring Sufficiency**

Federal and state rules, 40 CFR § 70.6(a)(3)(i)(B) and 30 TAC § 122.142(c) respectively, require that each federal operating permit include additional monitoring for applicable requirements that lack periodic or instrumental monitoring (which may include recordkeeping that serves as monitoring) that yields reliable data from a relevant time period that are representative of the emission unit's compliance with the applicable emission limitation or standard. Furthermore, the federal operating permit must include compliance assurance monitoring (CAM) requirements for emission sources that meet the applicability criteria of 40 CFR Part 64 in accordance with 40 CFR § 70.6(a)(3)(i)(A) and 30 TAC § 122.604(b).

With the exception of any emission units listed in the Periodic Monitoring or CAM Summaries in the FOP, the TCEQ Executive Director has determined that the permit contains sufficient monitoring, testing, recordkeeping, and reporting requirements that assure compliance with the applicable requirements. If applicable, each emission unit that requires



additional monitoring in the form of periodic monitoring or CAM is described in further detail under the Rationale for CAM/PM Methods Selected section following this paragraph.

#### Compliance Review

1. In accordance with 30 TAC Chapter 60, the compliance history was reviewed on August 3, 2017.

Site rating: 5.00 / Satisfactory Company rating: 1.81 / Satisfactory

(High < 0.10; Satisfactory ≥ 0.10 and ≤ 55; Unsatisfactory > 55)

2. Has the permit changed on the basis of the compliance history or site/company rating? .....No

#### Site/Permit Area Compliance Status Review

1. Were there any out-of-compliance units listed on Form OP-ACPS? .....No

2. Is a compliance plan and schedule included in the permit? .....No

#### Available Unit Attribute Forms

OP-UA1 - Miscellaneous and Generic Unit Attributes

OP-UA2 - Stationary Reciprocating Internal Combustion Engine Attributes

OP-UA3 - Storage Tank/Vessel Attributes

OP-UA4 - Loading/Unloading Operations Attributes

OP-UA5 - Process Heater/Furnace Attributes

OP-UA6 - Boiler/Steam Generator/Steam Generating Unit Attributes

OP-UA7 - Flare Attributes

OP-UA8 - Coal Preparation Plant Attributes

OP-UA9 - Nonmetallic Mineral Process Plant Attributes

OP-UA10 - Gas Sweetening/Sulfur Recovery Unit Attributes

OP-UA11 - Stationary Turbine Attributes

OP-UA12 - Fugitive Emission Unit Attributes

OP-UA13 - Industrial Process Cooling Tower Attributes

OP-UA14 - Water Separator Attributes

OP-UA15 - Emission Point/Stationary Vent/Distillation Operation/Process Vent Attributes

OP-UA16 - Solvent Degreasing Machine Attributes

OP-UA17 - Distillation Unit Attributes

OP-UA18 - Surface Coating Operations Attributes

OP-UA19 - Wastewater Unit Attributes

OP-UA20 - Asphalt Operations Attributes

OP-UA21 - Grain Elevator Attributes

OP-UA22 - Printing Attributes

OP-UA24 - Wool Fiberglass Insulation Manufacturing Plant Attributes

OP-UA25 - Synthetic Fiber Production Attributes

OP-UA26 - Electroplating and Anodizing Unit Attributes

OP-UA27 - Nitric Acid Manufacturing Attributes

OP-UA28 - Polymer Manufacturing Attributes

OP-UA29 - Glass Manufacturing Unit Attributes

OP-UA30 - Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mill Attributes

OP-UA31 - Lead Smelting Attributes

OP-UA32 - Copper and Zinc Smelting/Brass and Bronze Production Attributes

OP-UA33 - Metallic Mineral Processing Plant Attributes

OP-UA34 - Pharmaceutical Manufacturing

OP-UA35 - Incinerator Attributes

OP-UA36 - Steel Plant Unit Attributes

OP-UA37 - Basic Oxygen Process Furnace Unit Attributes

OP-UA38 - Lead-Acid Battery Manufacturing Plant Attributes

OP-UA39 - Sterilization Source Attributes

OP-UA40 - Ferroalloy Production Facility Attributes

OP-UA41 - Dry Cleaning Facility Attributes

OP-UA42 - Phosphate Fertilizer Manufacturing Attributes

OP-UA43 - Sulfuric Acid Production Attributes

OP-UA44 - Municipal Solid Waste Landfill/Waste Disposal Site Attributes  
OP-UA45 - Surface Impoundment Attributes  
OP-UA46 - Epoxy Resins and Non-Nylon Polyamides Production Attributes  
OP-UA47 - Ship Building and Ship Repair Unit Attributes  
OP-UA48 - Air Oxidation Unit Process Attributes  
OP-UA49 - Vacuum-Producing System Attributes  
OP-UA50 - Fluid Catalytic Cracking Unit Catalyst Regenerator/Fuel Gas Combustion Device/Claus Sulfur Recovery Plant Attributes  
OP-UA51 - Dryer/Kiln/Oven Attributes  
OP-UA52 - Closed Vent Systems and Control Devices  
OP-UA53 - Beryllium Processing Attributes  
OP-UA54 - Mercury Chlor-Alkali Cell Attributes  
OP-UA55 - Transfer System Attributes  
OP-UA56 - Vinyl Chloride Process Attributes  
OP-UA57 - Cleaning/Depainting Operation Attributes  
OP-UA58 - Treatment Process Attributes  
OP-UA59 - Coke By-Product Recovery Plant Attributes  
OP-UA60 - Chemical Manufacturing Process Unit Attributes  
OP-UA61 - Pulp, Paper, or Paperboard Producing Process Attributes  
OP-UA62 - Glycol Dehydration Unit Attributes  
OP-UA63 - Vegetable Oil Production Attributes